

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512



October 29, 2008

Mr. Jon Boyer, Compliance Manager
High Desert Power Project
19000 Perimeter Rd., Ste. 102
Victorville, CA 92394

**Subject: High Desert Power Project (97-AFC-1C)
Information Request for Reclaimed Water Petition**

Dear Mr. Boyer:

California Energy Commission staff requests the information specified in the enclosed data requests regarding your petition to use reclaimed water for some or all of the High Desert Power Project's water needs. The information requested is necessary to more fully understand the proposed modifications to the approved project.

This information request is being made in the area of Soil and Water Resources. Please provide a written response to me by December 1, 2008, or at a later date as may be mutually agreed upon.

If you have any questions or comments, please contact me either by telephone at (916) 654-3936, or by e-mail at smunro@energy.state.ca.us.

Sincerely,

A handwritten signature in blue ink that reads "Steve Munro".

STEPHEN D. MUNRO
Compliance Project Manager
Siting, Transmission and
Environmental Protection Division

Enclosure

High Desert Power Project
97-AFC-1C
Information Request
October 2008

Technical Area: Soil and Water

Author: Casey Weaver

BACKGROUND

The amendment petition proposed for the High Desert Power Producer (HDPP) project decision is the reversal of the prohibition for the power plant to use recycled waste water for power plant cooling needs. At the time of certification, a sufficient volume of recycled waste water was not available for power plant use. While a nearby waste water treatment plant (Victor Valley Wastewater Reclamation Authority (VWVRA)) was producing recycled wastewater, the recycled water was entirely consumed by other users and a prohibition of HDPP from using recycled waste water was made a condition of certification. Following certification of HDPP, VWVRA increased its capacity to treat waste water and in the near future, will have additional capability to provide additional volume of recycle waste water. In addition, the city of Victorville is planning the construction of a waste water treatment plant that will be capable of producing recycled waste water. The City of Victorville has tentatively agreed to provide recycled water from the proposed plant to HDPP. To complete its analysis, staff needs additional information regarding acquisition and use of recycled water for power plant needs.

DATA REQUESTS

1. Please provide the tasks and schedule you intend to implement if the amendment to Condition of Certification **Soil and Water-1** is approved.
2. Please describe your intended use, treatment and disposal of the recycled waste water.
3. Please identify what equipment, construction and permits will be required to provide recycled waste water to the facility.
4. Please identify what equipment, construction and permits will be required to treat and use recycled waste water at the facility.
5. Please provide an estimate of the quantity of waste water you intend to use. If you intend to increase the use of recycled waste water through time, please also provide a schedule and identify how these additional flows will be used.
6. Please provide a schematic showing how recycled water will be incorporated into the current water supply system.

BACKGROUND

During our site visit on September 16, 2008, various methods of water treatment were observed in operation. It appeared that a closed loop steam cycle system was in operation as well as an open circuit evaporative cooler system. It was unclear which water treatment method was used for which purpose and what the water quality requirements are for each system.

DATA REQUESTS

7. Please provide a schematic drawing for each of the water systems that include the water treatment method for each system.
8. Please provide the water quality requirements for each water system.
9. Please explain any additional water treatment planned and the schedule for implementation.

BACKGROUND

In the Petition to Amend, HDPP requested revision of Condition of Certification **Soil and Water- 4d**. The petition indicates that **Soil and Water-4d** specifies the amount of water that is required by the plant owner to be injected into the subsurface to create a "bank" of water available for withdrawal when SWP water is unavailable. In the petition, a reduction in the amount of water required to be injected relative to the amount of recycled waste water used in power plant operations is requested.

However, in May, 2006, **Soil and Water-4** was amended. In the 2006 amendment, **Soil and Water-4d** was revised to address the installation and implementation of a pre-injection reverse osmosis treatment system if the water banking goal is not met. Staff is not clear on which condition of certification the petition addresses.

DATA REQUESTS

10. Please provide, in its entirety and appropriately referenced, the condition or conditions of certification you wish to amend, add, or delete with proposed changes indicated as follows: deletions in ~~strikeout~~ and additions in **bold underline**.